

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILBERT NAPOLEON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Case No.: 2:24-CV-00186-BJR

**STIPULATED MOTION TO EXTEND
DEADLINES AND ORDER**

STIPULATED MOTION

Plaintiff Wilbert Napoleon and Defendant Amazon.com, Inc. hereby stipulate to extend the deadlines to respond to the Complaint and initial discovery deadlines.

On February 9, 2024, Plaintiff filed his putative Class Action Complaint. Dkt. No. 1. On February 15, 2024, Plaintiff served Defendant with the Complaint. Dkt. No. 16. On February 28, 2024, pursuant to the parties' stipulated motion to extend deadlines to amend and respond to Complaint, the Court extended the time for Amazon to answer or otherwise respond to the Complaint to March 28, 2024. Dkt. No. 18.

On March 6, 2024, Amazon filed a motion for a temporary stay of this action pending resolution of Amazon's motion to consolidate in a case currently pending before the Honorable Tana Lin, *In re Amazon Service Fee Litigation*, Case No. 2:22-cv-00743-TL. Dkt. No. 20. That motion has been fully briefed as of March 18, 2024.

On March 12, 2024, Amazon filed a notice of related case in this action with respect to *Natalie Gianne et al. v. Amazon.com, Inc.*, Case No. 2:24-cv-00309-RSM, assigned to the Honorable Ricardo S. Martinez. Dkt. No. 23.

In light of Amazon's pending motion to consolidate in the *Amazon Service Fee* case, and the parties' ongoing conferral regarding whether to consolidate this action with the related *Gianne* case, the parties agree and respectfully request that the Court extend the following deadlines for good cause:

Deadline for Rule 26(f) Conference	April 22, 2024
Deadline for Amazon to Respond to the Complaint	April 29, 2024
Deadline for Plaintiff to Amend, under Fed. R. Civ. P 15(a)(1)(A)	
Initial Disclosures Pursuant to Rule 26(a)(1)	April 29, 2024
Combined Joint Status Report and Discovery Plan as Required by Rule 26(f) and Local Civil Rule 26(f)	May 6, 2024

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the parties, and respectfully submitted for the Court's approval, that the above deadlines be reset as requested.

Dated: March 20, 2024

Respectfully submitted,

FENWICK & WEST LLP

By: /s/ Brian D. Buckley
Brian D. Buckley, WSBA No. 26423

401 Union Street, 5th Floor
Seattle, WA 98101
Telephone: 206.389.4510
Email: bbuckley@fenwick.com

Attorneys for Defendant Amazon.com, Inc.

DOVEL & LUNER, LLP

By: /s/ Jonas B. Jacobson

Jonas B. Jacobson (*pro hac vice*)

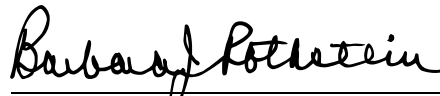
Christin Cho (*pro hac vice*)
Simon Franzini (*pro hac vice*)
201 Santa Monica Blvd., Suite 600
Santa Monica, California 90401
Telephone: (310) 656-7066
Facsimile: (310) 656-7069
Email: jonas@dovel.com
Email: christin@dovel.com
Email: simon@dovel.com

CARSON & NOEL PLLC
Wright A. Noel, WSBA No. 25264
20 Sixth Ave. NE
Issaquah WA 98027
Tel: 425-395-7786
Fax: 425-837-5396
Email: wright@carsonnoel.com

Attorneys for Plaintiff Wilbert Napoleon

IT IS SO ORDERED.

DATED this 22nd day of March, 2024.



Barbara Jacobs Rothstein
U.S. District Court Judge

Presented by:
FENWICK & WEST LLP

By: /s/ Brian D. Buckley

Brian D. Buckley, WSBA No. 26423

401 Union Street, 5th Floor
Seattle, WA 98101
Telephone: 206.389.4510
Facsimile: 206.389.4511
Email: bbuckley@fenwick.com

Attorneys for Amazon.com, Inc.